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NOTE: CHANGES MADE BY  
THE COURT

8 Attorneys for Plaintiff  
9 United States of America

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA, ) No. CR 11-436(A)-MRW  
13 )  
Plaintiff, ) [PROPOSED] PROTECTIVE ORDER  
14 ) REGARDING CONFIDENTIAL  
v. ) PRODUCTION OF DOCUMENTS  
15 )  
HUGO RENE BAQUIAX, )  
16 JOEL CIRILO SOSA HERNANDEZ, )  
17 )  
Defendants. )  
18 )  
19 )

20 The Court has read and considered the Stipulation Regarding  
21 Protective Order, filed by the parties in this matter. The Court  
22 hereby finds that the Stipulation, which this Court incorporates  
23 by reference into this Order, demonstrates facts that support the  
24 issuance of a protective order in this case. Accordingly, for  
25 good cause shown, IT IS HEREBY ORDERED THAT:

26 1. Documents pertaining to the investigation and  
27 prosecution of criminal activity by defendants HUGO RENE BAQUIAX  
28 ("BAQUIAX") and JOEL CIRILO SOSA HERNANDEZ ("SOSA"), which are

1 disclosed by the government to satisfy its discovery obligations  
2 (hereinafter referred to as the "CI information"), shall be  
3 subject to this Protective Order.

4 2. In response to defendant's discovery requests and the  
5 government's obligations, the government will produce to  
6 defendants' counsel a copy of the CI information.

7 3. The government will produce the CI information in an  
8 electronic format, which will consist of paper documents that  
9 have been scanned onto disks or DVDs.

10 4. The electronic documents will be numbered and stamped  
11 "CONFIDENTIAL" and the cover of the disks or DVDs will be marked:  
12 "WARNING: CONTENTS SUBJECT TO PROTECTIVE ORDER. COPYING OR  
13 UNAUTHORIZED VIEWING IS SUBJECT TO PUNISHMENT AS CONTEMPT OF  
14 COURT."

15 5. The following individuals are "Named Individuals" under  
16 the terms of this protective order: Gregory Nicolaysen and  
17 employees or agents of his law firm; George S. Steele and  
18 employees or agents of his law firm; and investigators and  
19 experts retained by Mr. Nicolaysen or Mr. Steele to work on this  
20 case.

21 6. Subject to the exceptions in Paragraph 7, Named  
22 Individuals are the only people who will have access to the CI  
23 information and any copies thereof. The CI information and any  
24 copies thereof may be shown to anyone else only in the presence  
25 of a Named Individual. No one may leave or otherwise provide any  
26 CI information, or any copies thereof, to anyone not identified  
27 as a Named Individual. Other than Named Individuals, no one may  
28 copy, take notes from, or otherwise record, any CI information.

1 Gregory Nicolaysen and George S. Steele shall maintain a record  
2 of the number of copies of any CI information that are created.

3 7. The only exception to the provisions of Paragraph 6 is  
4 that the CI information and copies thereof may be shown to any  
5 defendant, but only in the presence of a Named Individual.

6 8. Within one month after the conclusion of the sentencing  
7 if there is no appeal, or within one month after the conclusion  
8 of any appeal, Gregory Nicolaysen and George S. Steele will  
9 return all CI information, and all copies thereof, to the United  
10 States Attorney's Office for the Central District of California.

11 9. This order shall apply to any counsel who are added as  
12 counsel of record, substitute into this matter as counsel of  
13 record, replace current counsel as counsel of record, or in any  
14 other way become counsel of record in this matter.

15 10. A willful violation of this Protective Order by a  
16 person with notice of its contents may be punishable as contempt  
17 of a court order or other criminal sanctions.

18 IT IS SO ORDERED.

19  
20 DATED: October 4, 2011



THE HONORABLE MICHAEL R. WILNER  
UNITED STATES MAGISTRATE JUDGE

21  
22 Presented by:

23  
24 /s/  
JAMES M. LEFT  
25 Special Assistant United States Attorney  
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